

Exhibit 1

C. “Customer” includes the definition contained in U.C.C. § 4-104: a person or entity having an account with a bank or for whom a bank has agreed to collect items, including a bank

that maintains an account at another bank. Where accounts are or were held for the benefit, or under the control, of a person or entity listed in the exhibit attached hereto, those persons or entities are also “Customers.”

D. “De minimis transaction” means a payment made by Specially Designated Global Terrorists and Specially Designated Narcotics Traffickers listed on Exhibit A to a third party not listed on Exhibit A that is either (1) a recurrent monthly or quarterly payment, such as a payment of a utility bill, that does not exceed an aggregate annual total payment to any recipient of more than \$10,000, or (2) a non-recurrent payment that does not exceed \$200.

E. “Funds Transfers” means the origination of, receipt of, or other participation in, the transfer of funds, securities, or other monetary instruments or investment securities by any means, including, but not limited to, coins, currency (including bank notes), bank credits, checks, travelers checks, bank checks, money orders, shares, securities, bonds, drafts, and letters of credit, internal book entries at a branch, automated clearinghouse transactions, FEDWIRE, SWIFT, CHIPS, other wire transfers, or any other electronic means. “Funds Transfers” as used herein incorporates (but is not limited to) the definition of “electronic fund transfer” set forth in 15 U.S.C. § 1693a.

~~D.F.~~ “Immaterial Account” means an account that at no time ever held a balance of more than \$1,000.

~~E.G.~~ “Processed” means the sending of, receipt of, or other participation in Funds Transfers, but excludes Funds Transfers which You failed or refused to execute.

~~F.H.~~ “Specially Designated Narcotics Trafficker” means foreign persons designated by the Secretary of the Treasury because they are found to be materially assisting in, or providing financial or technological support for or to, or providing goods or services in support of, the international narcotics trafficking activities of a specially designated narcotics trafficker as set

forth in 31 CFR § 598.314.

I. “Specially Designated Global Terrorist” means individuals or entities designated pursuant to Executive Order 13224.

~~G.J.~~ “Sub-account” means an account within a primary account.

~~H.K.~~ No interrogatory shall be left unanswered merely because an objection is made to another part of the interrogatory.

~~H.L.~~ If any interrogatory cannot be answered in full after exercising due diligence to secure the information to do so, answer the interrogatory to the extent possible, specifying any inability to answer the remainder of any such interrogatory and stating all information or knowledge presently available concerning the unanswered portion of said interrogatory.

~~J.M.~~ If any interrogatory demands an answer that is withheld on the basis of a claim of privilege, work product or any other reason, (i) answer any portion of the interrogatory that is not subject to such a claim and indicate with specificity and particularity the basis of said withholding; and (ii) provide the information required by Rule 26.2 of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York (“Local Rules”).

~~K.N.~~ The interrogatories herein shall be deemed continuing in nature, and if any information is obtained between the time that answers are supplied and the time of trial, supplemental or amended answers must be made in accordance with Rule 26(e) of the Federal Rules of Civil Procedure.

O. For those interrogatories that request a “total dollar value” for Funds Transfers, if transfers were processed in currencies other than U.S. dollars, You may compute non-U.S. dollar denominated transfers by separately listing the total amounts of those transfers in the currency used to execute the transaction (*e.g.*, Lebanese Pounds, Euros, Sterling).

L.P. For each interrogatory, please answer the primary interrogatory and sub-interrogatories separately.

II. INTERROGATORIES

1. State the total number of Accounts You held for the Specially Designated Global Terrorists and Specially Designated Narcotics Traffickers listed on Exhibit A during the period between January 1, 2003, and December 31, 2011, regardless of whether the person or entity was designated at the time You held the Accounts.

1a. State the total number of Accounts You held for the Specially Designated Global Terrorists and Specially Designated Narcotics Traffickers listed on Exhibit A who were so designated during the period between January 1, 2003, and November 14, 2011, excluding Immaterial Accounts.

1b. State the total number of Accounts You held for the Specially Designated Global Terrorists and Specially Designated Narcotics Traffickers listed on Exhibit A who were so designated after November 14, 2011, excluding Immaterial Accounts.

2. State the total number of Accounts You held for the Specially Designated Global Terrorists and Specially Designated Narcotics Traffickers listed on Exhibit A more than sixty (60) days after the date of designation of those individuals or entities by the United States government through December 31, 2021.

2a. For the total number of Accounts You held for the Specially Designated Global Terrorists and Specially Designated Narcotics Traffickers listed on Exhibit A more than sixty (60) days after the date of designation of those individuals or entities by the United States government in your answer in response to Interrogatory No. 2, state the sub-total of those Accounts that You left open after designation at the direction of a regulator.

2b. For the total number of Accounts You held for the Specially Designated Global Terrorists and Specially Designated Narcotics Traffickers listed on Exhibit A more than sixty (60) days after the date of designation of those individuals or entities by the United States government in your answer in response to Interrogatory No. 2, state the sub-total of those Accounts that You blocked but did not close.

3. State the total number of Funds Transfers You Processed for the Specially Designated Global Terrorists and Specially Designated Narcotics Traffickers listed on Exhibit A from the date of designation of those individuals or entities by the United States government through November 14, 2011 ~~December 31, 2011~~.

3a. For the total number of Funds Transfers you answer in response to Interrogatory No. 3, state the sub-total of those transfers that involved transfers to a customer's own accounts.

3b. For the total number of Funds Transfers you answer in response to Interrogatory No. 3, state the sub-total of those transfers that involved transfers to a customer's own sub-accounts.

3c. For the total number of Funds Transfers you answer in response to Interrogatory No. 3, state the sub-total of those transfers that involved mortgage payments.

3d. For the total number of Funds Transfers you answer in response to Interrogatory No. 3, state the sub-total of those transfers that involved interest payments.

3e. For the total number of Funds Transfers you answer in response to Interrogatory No. 3, state the sub-total of those transfers that involved *de minimis* transactions.

4. State the total number of Funds Transfers You Processed for the Specially Designated Global Terrorists and Specially Designated Narcotics Traffickers listed on Exhibit A from the date of designation of those individuals or entities by the United States government through December 31, 2021.

4a. For the total number of Funds Transfers you answer in response to Interrogatory No. 4, state the sub-total of those transfers that involved transfers to a customer's own accounts.

4b. For the total number of Funds Transfers you answer in response to Interrogatory No. 4, state the sub-total of those transfers that involved transfers to a customer's own sub-accounts.

4c. For the total number of Funds Transfers you answer in response to Interrogatory No. 4, state the sub-total of those transfers that involved

mortgage payments.

4d. For the total number of Funds Transfers you answer in response to Interrogatory No. 4, state the sub-total of those transfers that involved interest payments.

4e. For the total number of Funds Transfers you answer in response to Interrogatory No. 4, state the sub-total of those transfers that involved *de minimis* transactions.

5. State the total dollar value of all Funds Transfers You Processed for the Specially Designated Global Terrorists and Specially Designated Narcotics Traffickers listed on Exhibit A from the date of designation of those individuals or entities by the United States government through December 31, 2011.

5a. For the total dollar value of all Funds Transfers you answer in response to Interrogatory No. 5, state the sub-total of those transfers that involved transfers to a customer's own accounts.

5b. For the total dollar value of all Funds Transfers you answer in response to Interrogatory No. 5, state the sub-total of those transfers that involved transfers to a customer's own sub-accounts.

5c. For the total dollar value of all Funds Transfers you answer in response to Interrogatory No. 5, state the sub-total of those transfers that involved mortgage payments.

5d. For the total dollar value of all Funds Transfers you answer in response to Interrogatory No. 5, state the sub-total of those transfers that involved interest payments.

5e. For the total dollar value of all Funds Transfers you answer in response to Interrogatory No. 5, state the sub-total of those transfers that involved *de minimis* transactions.

6. State the total dollar value of all Funds Transfers You Processed for the Specially Designated Global Terrorists and Specially Designated Narcotics Traffickers listed on Exhibit A from the date of designation of those individuals or entities by the United States government

through December 31, 2021.

- 6a. For the total dollar value of all Funds Transfers you answer in response to Interrogatory No. 6, state the sub-total of the total dollar value of those transfers that involved transfers to a customer's own accounts.
- 6b. For the dollar value of all Funds Transfers you answer in response to Interrogatory No. 6, state the sub-total of the total dollar value of those transfers that involved transfers to a customer's own sub-accounts.
- 6c. For the dollar value of all Funds Transfers you answer in response to Interrogatory No. 6, state the sub-total of the total dollar value of those transfers that involved mortgage payments.
- 6d. For the dollar value of all Funds Transfers you answer in response to Interrogatory No. 6, state the sub-total of the total dollar value of those transfers that involved interest payments.
- 6e. For the dollar value of all Funds Transfers you answer in response to Interrogatory No. 6, state the sub-total of the total dollar value of those transfers that involved *de minimis* transactions.

2.7. State the total number of occasions up until the present, upon which You disclosed Customer information to a government other than the government of Lebanon, or to a representative of a government other than the government of Lebanon, without obtaining prior consent from the Customer or obtaining the prior consent of Lebanese authorities before making the disclosure.

Dated: June 9, 2022 [UPDATED November 4, 2022]
Hackensack, New Jersey

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